UNITED STATES DISTRICT COURT of OREGON for the COUNTY of MULTNOMAH

Case # 3:24-CV-291-JR

Plaintiff:

Daryl Harris

Jury Trial Yes 🗆 No. 🔽

V/S

Punitive damages Pain and Suffering \$444,000,000

Defendants:

Ted Wheeler Portland city Mayor and Chairman of City / County Joint office of Homeless Services Dan Ryan Portland City Commissioner Chairman of the Housing Committee and Portland Human Rights and Equity Commission and Office of Community & Civic Life, Transitions project Inc., Central City Concern, Income Property Management Co, Garlington Center (Cascadia Housing Corp), Imani Mental Health and Wellness, Office of Community & Civic Life, Black Wolf Protection Group, Wilshire Native American Methodist Church Fellowship (Great Spirit UMC), Bureau of Labor and Industries, Portland Regional Office of Legal Aid, Multnomah County Central Library,

State of Oregon BIPOC Police Advisory Committee, Oregon Disability Determination Board, Multnomah County Health Department, Multnomah County Mental Health/ Behavioral Health Committee, Adventist Health Primary Care - Parkrose, Legacy Medical Group-Good Samaritan, FBI Joint Terrorism Task Force / Homeland Security Fusion Center, Democratic National Committee (DNC)

STATEMENT OF CLAIM

- I, Darryl Harris, of portland, in oregon, make oath and say that,
 - 1. Ted Wheeler mayor of the city of Portland in his performance of his duties under color of law in his position as chairman of City County Homeless services inclusion with public-private partnerships state and federal actors criminalized me labeling me a national security risk/ Identity Extremist after I began the process to file suit against the the city of Portland for violations of my ADA rights (HIPAA Act) privacy rights were violated at the Bud Clark Center Shelter deprived me of my my right pursuant to Executive Order diversity equity and inclusion, as my social media represents American Indian values and my Fist Amendment Constitutional Rights, and Violated my Fourth Amendment protections pursuant to 42 USC 1983, in retaliation for my filing grievance with Portland Transition Projects Inc. concerning Americans with the Disability Act

violations of privacy at the Bud Clark Center shelter facility. Collusion continued as Central City Concern Imani Behavioral Health then thereafter inappropriately invited me to enter their housing program colluding on behalf mayor Ted wheeler to prevent me from obtaining (Redress of Grievances) I then was deprived of due process officials and officers cease correspondence via email and would not return any of my calls after I was placed in the Golden West housing facility. In violation of my protected rights under the US Constitution First Amendment In violation of my protective rights under 18 U.S. Code § 242 and violated my Fourth Amendment Rights and the 14th Amendment and .34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking also in violation of my protected rights under the civil Rights act of 1968 and US Constitution :25 U.S.C. United States Code, 2020 Edition Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE

- 2. Dan Ryan Portland City Commissioner in His official capacities and performance of his duties under color of law interfered with the complaint process I filed with the Portland Equity and Human rights commission, as the director of the Portland Equity office resigned for not being allowed to implement her vision of equity in her official capacity. He also as a private property owner at 5014 NE Campaign St, Portland, OR 97218, lured me into a housing situation in collusion with mayor Ted Wheeler that was not conducive to my needs and participated in and helped to facilitate surveillance on me during my time there subjecting me to a hostile living environment where I was recorded and doxed and placed under surveillance and wiretaped. His actions resulted in exposing me and my private information with neighbors on the block.. DianRyan lured me into a housing situation that was not of the Environment I applied for subjecting me to disparate treatment in a hostile living environment harassed about my social media profile and my claims as an American Indian in contradiction of my rights pursuant to Executive Order 11246, whereas I was subsequently made homeless as a result. In violation of my protected rights under Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, in retaliation for my filing grievance with Portland Transition Projects Inc. Dan Ryan as in his official capacity overseeing the Portland Human Rights and Equity Commission deprived me of due process coordinated efforts were used to prevent me from obtaining by interfering with the director of the Portland equity and human rights office to prevent me from attaining (Redress of Grievances) in violation of my protected rights under the US Constitution First Amendment In violation of 18 U.S. Code § 242 Violated Fourth Amendment protections.: and 14th Amendment 34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking also in violation of my protected rights under the civil Rights act of 1968 and US Constitution :25 U.S.C. United States Code, 2020 Edition Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE
- 3. Transitions Project Inc. denied me due process of grievances and in retaliation and in collusion with the mayor Ted Wheelers Portland Joint Terrorism Task Force violated my

Fourth Amendment Rightst o prevent me from attaining (Redress of Grievances) filed with the Portland equity and human Rights commission to investigate my rights pursuant to Executive Order 11246 diversity equity and inclusion in violation of my protected rights under the US Constitution First Amendment In violation of 18 U.S. Code § 242 Violated Fourth Amendment protections.: and 14th Amendment 34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking also in violation of my protected rights under the civil Rights act of 1968, and Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, and the US Constitution :25 U.S.C. United States Code, 2020 Edition Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE

- 4. Garlington Center (Cascadia Housing Corp), in collusion mayor of the city of Portland Ted Wheeler's Joint Terrorism Task Force violated my Fourth Amendment rights.to prevent me from adding me to the lease when I was a resident at the Garlington Apartments depriving me of procedural due process when when requesting to be added to the lease. Garlington apartments building manager never replied. 24 CFR § 966.51 Applicability. All done in collusion with city, county, state, public and private contractors to prevent me from attaining (Redress of Grievances) in violation of my protected rights under the US Constitution First Amendment In violation of 18 U.S. Code § 242 Violated Fourth Amendment protections.: and 14th Amendment 34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking also in violation of my protected rights under the civil Rights act of 1968 and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, and US Constitution :25 U.S.C. United States Code, 2020 Edition Title 25 INDIANS CHAPTER 46 INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE
- 5. State of Oregon BIPOC Police Advisory Committee, in the performance of their duties under color of law were in collusion with private, state, and federal actors perpetuated false claims about me creating defamatory narrative that I was a identity extremist and actively pursued framing strategies that would make me look like a national security threat.. This social justice organizations affiliated with this advocacy have no exceptions within their organizational purviews / agendas for The Misclassified American Indians and use their resources to marginalize and treat differently the Miss classified American Indian all done to make sure they would not have to allow me the rights pursuant to Executive Order 11246 diversity equity and inclusion.. What they have done to me is clearly in violation of my protected rights under the US Constitution :25 U.S.C. United States Code, 2020 Edition Title 25 INDIANS CHAPTER 46 INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE -The social justice groups and organizations mentioned here have been engaging in Grassroots Whispering campaigns damaging my reputation with members of the associated with specific social

justice organizations, whereby some individual members in representation of those organizations took it up on themselves to use my data and day-to-day information information to set me up and to used framing tactics to destroy my character.. Coordinated efforts to criminalize me were used their positions to prevent me from obtaining (Redress of Grievances) depriving me of due process: in violation of my protected rights under the Constitution First Amendment In violation of 18 U.S. Code § 242 Violated Forth Amendment protections: and the 14th Amendment and is in violation of my constitutional protections in accordance with The Civil Rights Act of 1968 [PublicLaw 90-284, 82 Stat. 73] As Amended Through P.L .117-103 Which is an extension of: Civil Rights Act of 1964 [Public Law 88-352] [As Amended Through P.L. Title 42-Public Health and Welfare] and Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,

- 6. Democratic National Committee (DNC) in the performance of its duties under the color of law in collusion with private, state and federal interstate agencies, deprived me of free speech by censoring and Shadow banning my social media accounts while using narratives I created for their own personal gain and weaponized it's FBI department placing me under warrantless surveillance and wiretapping in in violation of my protected rights under the Fourth Amendment and in violation of my protected rights under the first Amendment.and Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, In 2009 I spearheaded that discussion as a founding member of Organizing For Acton since then President Barack Obama just before he left office quietly submitted an executive order that removed NEGRO from the federal records [I H.R.4238 - To amend the Department of Energy Organization Act and the Local Public Works Capital Development and Investment Act of 1976 to modernize terms relating to minorities.] that made it difficult and impossible for some to trace their genealogy establishing connections with treaties of this land. Ever since then those of us who have been speaking out about our genealogy have been subjected to increase targeting formulating strategies to frame me as a criminal to give me a felony to sabotage my social media presence as an organizer undermining my credibility as an American Indian OFA organizer using Hillary Clinton campaign organizers as an OFA volunteer was treated differently when volunteering for that organization. This is in violation of my protected rights under the civil Rights act of 1968. Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, And in violation of my protected rights under 25 U.S.C. United States Code. Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE
- 7. Community and Civic Life in the performance of their duties under the color of law in collusion with other state and federal actors, members of the community and Civic Life North Portland coordinated targeted surveillance subjecting me to warrantless surveillance, stalking, doxing, inclusion with other state actors. formulated strategies to criminalize me. In violation of my protected rights under the Fourth Amendment, in violation of my protected rights under the 14th Amendment also in violation of my civil

rights under the civil Rights act of 1968 and in violation of my protected rights under 25 U.S.C. United States Code, Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE

- 8. Wilshire Native American Methodist Church Fellowship /Great Spirit UMC in the performance of its duties under the color of law change the name of its Church and change the date scheduled for my joining the church in order to prevent me from joining the church under the title that included Native American in connection with The Wilshire Church organization. With knowledge of my genealogy and having access to my genealogical documentation and access to my DNA and stealing a page out of my genealogical record, that showed my genealogical connections to John f Kennedy, subsequently lowered the blood quantum for their tribe so that immigrants with no genealogical connection to any treaties of this land, could join their tribal organizations and never offered me that opportunity to me pursuant to Executive Order 11246 diversity equity and inclusion. Instead participated in warrantless wiretapping and surveillance in collusion with other private. Federal and state actors, in violation of my protected rights under the Fourth Amendment, my protective rights under the 14th Amendment and my protective rights under the Civil Rights Act of 1968.amd Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, and my protected rights under 25 U.S.C. United States Code, Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE
- 9. Black Wolf Protection Group private security firm in the performance of their duties under the color of law in collusion with State Federal and private actors without warrant perform data collection place me under undue warrantless surveillance and wiretapping and participated in the criminalization and framing targeting me. This is in violation of my protective rights under the Fourth Amendment, this is a violation of my protective rights under the 14th Amendment and in violation of my protections under 25 U.S.C. United States Code, Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE
- 10. Imani Behavioral Health in the performance of their duties under the color of law in collusion with other state and federal actors, engaged in in and coordinated warrantless wiretapping targeted attacks on me subjecting me to warrantless surveillance, stalking, doxing, inclusion with other state actors formulated strategies to criminalize me through framing strategies after inappropriately inviting me to receive housing assistance from their program and 50 c3 opportunities with applying for counseling during the time I was in a grievance process with the Transitions Project homeless resource administration in an attempt to resolve grievance filed concerning an issue at the Bud Clark Çenter shelter. During my time there I was badgered about my race and ethnicity Creed and color not afforded the benefits pursuant to diversity equity and inclusion Executive Order 11246, and doxed me during my time attending meetings with other clients sharing my information with community organizers and activists leaders in the state of Oregon BIPOC In violation of my protected rights under the Fourth Amendment, in violation of

my protected rights under the 14th Amendment also in violation of my protected rights under the Civil Rights act of 1968, and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, and in violation of my protected rights under 25 U.S.C. United States Code, Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE

- 11. State of Oregon Department of Human Services Disability Determination Board in their performance of their duties under color of law acted In collusion with other Federal and State actors Violated my privacy rights under the HIPAA Act violating my privacy rights under the Fourth Amendment of the Constitution in retaliation, determined that I was no longer disabled which was false claim against me but corrected by the Social Security Administration . February the 9th 2024 at the end of my emergency room visit or reviewing my billing information I learned that my billing information was altered claiming I was working full-time. This was done to cover up warrantless investigations targeting me, Also they made appointments for me with a political psychologist for a psych evaluation which has nothing to do with my disability. Coordinated efforts were used to prevent me from obtaining (Redress of Grievances) depriving me of due process violation of my protected rights under the US Constitution First Amendment: 18 U.S. Code § 242 and USC 42: The Public Health and Welfare Violated my Fourth Amendment protections: and my protections under the 14th Amendment also in violation of my protected rights under the civil Rights act of 1968 and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,
- 12. Multnomah County Mental Health/ Behavioral Health Committee in collusion Central City Concern both in their performance of duties acting under color of law and they themselves and other state and Federal actors violated my rights under the HIPAA Act Willfully participated in the intrusive warrantless surveillance where I had been targeted and criminalized violating my protected rights under 45 CFR 164 524 and other protections violated pursuant theCivil Rights. Act in collusion Coordinated efforts were used to prevent me from obtaining due process for (Redress of Grievances): in violation of the protected rights under the US Constitution First Amendment In violation of my protected rights under 18 U.S. Code § 242 and USC 42: The Public Health and Welfare and Violated Fourth Amendment protections: and the 14th Amendment, also in violation of my protected rights under the Civil Rights act of 1968.and Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,
- 13. Adventist Health Primary Care- Parkrose, in collusion with the Oregon Disability Determination, and other state actors in their negligence and providing substandard care violated my rights under the HIPAA and willfully participated in the intrusive warrantless surveillance and mismanagement of online records Records that occurred as a result violating my protected rights under 45 CFR 164 524 and other protections violated

pursuant the civil Rights. Act Coordinated efforts were used to prevent me from obtaining a process for (Redress of Grievances) to destroy my ability to successfully appeal disability determination board assessment that I somehow was not disabled anymore: in violation of my protected rights under the US Constitution First Amendment In violation of my protected rights under 18 U.S. Code § 242 and USC 42: The Public Health and Welfare in violation of my Fourth Amendment protections: and the 14th Amendment and in violation of my protected rights under the Civil Rights Act of 1968 and Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,

- 14. Legacy Medical Group Good Samaritan in the performance of their duties acted in collusion with the Oregon Disability Determination some standard care violated my privacy rights under the HIPAA Act and willfully participated in the intrusive warrantless surveillance and mismanagement of online records and digital Records that occurred as a result violating my protected right 45 CFR 164 524 and other protections violated pursuant to the Executive Order 11246 as a straight male patient. Coordinated efforts in collusion with Disability Determination board used to prevent me from obtaining due process for(Redress of Grievances) to destroy my ability to successfully appeal disability determination board assessment that I somehow was not disabled anymore: In violation of my protected rights under the US Constitution First Amendment In violation of my protected rights under 18 U.S. Code § 242 and USC 42: The Public Health and Welfare and Violated my Fourth Amendment protections and in violation of my protections under the 14th Amendment also in violation of my protected rights under the civil Rights act of 1968 and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,
- 15. Bureau of Labor and Industries in the performance of their duties under color of law were in collusion with other state actors deprived me of due process. Coordinated efforts to prevent my housing complaint from being part of the record making my housing complaint completely disappear from the system preventing me from attaining the desperately needed redress of grievance filed while living at the Golden West Central City Concern manage housing depriving me of the ability to attain (Redress of Grievances) acted in collusion with my former employer Community Visions Inc against my interest and in the interest of the company. Bureau of Labor and industries is clearly in violation of my protected rights under the US Constitution First Amendment In violation of my protected right 18 U.S. Code § 242 the Bureau of Labor and industries in their refusal to honor my request to submit to me a letter to sue a former employer WinCo Foods INC. Served in the interest of the company and is clearly in violation of my protected rights under the under the First Amendment depriving me of due process of law and in violation my protected rights under the 14th Amendment also in violation of my protected rights under the civil Rights act of 1968
- 16. Portland Regional Office of Legal Aid, in the performance of it's duties under color of law were in collusion with Income Property Management Victorian Inn Apartments and other

state actors deprived me of due process Coordinated efforts to prevent me from obtaining (Redress of in violation of my protected rights under the Constitution First Amendment :18 U.S. Code § 242 since 2018 have been denied my request for civil rights attorney to address my labor issues and housing issues and 2023 closed a doable case dealing with landlord tenant issue: in violation of my protected rights under the 14th Amendment. Also in violation of my protective rights under the civil Rights act of 1968

- 17. Income property management Victorian Inn Apartments in the performance of its duties under color of law in collusion city, county and State actors and property managers participated in and allowed stalking by building maintenance employee and allowed warrantless surveillance. Since I have been a resident here under this management, I have been treated differently than other tenants. I have endured retaliation, harassment, negligence and stalking during my time here. Income property management in collusion with other state actors doxxed me and shared my information coming and going from the apartment complex this is in violation of my protected rights under 34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking in violation of my protected rights under the 14th Amendment. Also in violation of my protected rights under the 1968 and the Fourth Amendment.and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,
- 18. Multnomah County Central Library. In the performance of its duties under color of law In collusion city of Portland and other state actors Deprived me of due process Coordinated efforts to prevent me from obtaining (Redress of Grievances) ignoring my legal right to request a viewing of a video at the Northwest facility on Thurman that is a part of a police report of a stalking incident that occurred.: in violation of my protected rights under the US Constitution First Amendment In violation of my protected right 18 U.S. Code § 242. My email and phone messages were ignored. In violation of my protected rights under the 14th Amendment also in violation of my protected rights under the civil Rights act of 1968 and Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,
- 19. Central City Concern Concern in the performance of its duties under color of law in collusion with other state actors abandoned their duty of care owed to me during my time in housing they managed. I suffered disparate treatment and retaliatory treatment in my quest counseling services, seeking housing services with a promise of receiving assistance to develop my own 501c3, but found myself being retaliated against for exercising my right to self identify as an Miss Classified American Indian seeking housing. I was arbitrarily placed under surveillance, Warrantlessly Wiretapped and stalked to and from my places of employment during my time living in housing that is in partnership with the City County Joint Homeless services headed by the Mayor of the city of Portland including Cascadia housing where I was targeted as well they were all in collusion with mayor Ted Wheeler who oversees the joint office, as a result I was treated disparately at Central City Concern- Imani Behavioral Health housed in the Golden

West, I unlike others in the Imani program whom were labeled identity extremists we're still able to receive Housing Services for permanent placement getting help from Central City concern. I was Made homeless in retaliation for acting Within my protected right to file grievance with the state of Oregon Ethics Point, contacting Governor Kate Brown via email and Via telephone, and reaching out to Senator Ron Wyden of Oregon and to to self identify, and to pursue self-determination, Central City Concern, Imoni MBehavioral Health Center provided no record of my being at the Golden West at my request and had claim to have no knowledge of why I was there. This was in retaliation asserting my protected rights under Article 7 First Amendment Bill of Rights under US Constitutional Law, to self identify as an American Indian is in violation of my rights under the Civil Rights Act of 1968 [PublicLaw 90-284, 82 Stat. 73] As Amended Through P.L .117-103 Which is an extension of: Civil Rights Act of 1964 [Public Law 88-352] [As Amended Through P.L. Title 42-Public Health and Welfare] also in violation of my protected rights under the US Constitution First Amendment In violation of 18 U.S. Code § 242 - I was denied due process Coordinated efforts were used to prevent me from obtaining (Redress of Grievances): which is also in violation of my protected rights under the Constitution First Amendment Violated my protected rights under the Fourth Amendment in collusion with other state and Federal actors: and in violation of my protected rights under the 14th Amendment, and 34 USC 12491; Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking also in violation ofmy constitutional protections in accordance with 25 U.S.C. United States Code, Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE also also in violation of my protected rights34 USC 12491: Housing protections for victims of domestic violence, dating violence, sexual assault, and stalking. And Oregon RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights,

20. FBI Joint Terrorism Task Force / Homeland Security Fusion Center, in collusion with date and county agencies in the performance of their duties under color of law, in collusion with private, state, and federal actors placed me on a government watch list as a national security risk listing me as an Identity Extremist at the request of the mayor of the city of Portland using warrantless wiretapping and surveillance and violation of my protected rights under the Fourth Amendment, and violation of my protected rights under the 14th Amendment, in violation of my protected rights under the Civil Rights Act of 1968 and is in conflict with Oregon or RS 181a250 and have compromised safeguards for ORS 21a 250 and the other protections pursuant to my civil rights, as an American Indian under Title 25 - INDIANS CHAPTER 46 - INDIAN SELF-DETERMINATION AND EDUCATION ASSISTANCE

RELIEF:

With 27 years of maintaining critical Medical recovery issues, as a social media civil rights and human rights advocate doing my best to do my part in helping to bring about A More Perfect Union I have suffered great losses. Having being deprived of sufficient standard of Medical Care, due to me, miss treated by doctors, endured continuous course of negligence, ignorance,

incompetence, being criminalized unfairly denied housing opportunities, treated differently once acquiring housing, I have been denied due process by City, state Federal agency targeted by both public and private government contractors, operating in collusion, privacy rights violated my overall health is in decline and my character and reputation emotional mental and physical health has suffered irreparable damages, including family relationships, eligibility for the job opportunities along with destroying any prospects of continuing my career as a social media strategist, social equity advocate, social justice advocate, human rights and civil rights. organizer and activist both have been irreparably damaged. Therefore I humbly ask this Court under it's Federal jurisdiction, to ORDER the defendants To Cease and Desist their coordinated retaliation remove my name from any government watch lists that register me as a National National security risk / identity extremist and discontinue targeting me without probable cause, and place an order on my behalf to remove all barriers denying me due process, and procedural due process an order all defendants where applicable to cease depriving me of my ADA Rights to privacy, and and to cease and desist unwarranted wiretapping and surveillance in violation of my Fourth Amendment rights, and to cease retaliation for my exercising My first Amendment rights as an Miss classified American Indian, Social Media volunteer strategist, to cease and desist the censoring of my social media and within your jurisdiction make a Declaration establishing Equitable and Fair treatment for The MisClassified American Indian with additional reflective measures and safeguards added protections to the 4th Amendment that include protections for the American Indian and order the state of Oregon to provide for the American Indian Equal Access to Public services, and the right to participate in, and to be included in federally funded state and county programs and social justice organizations and institutions an order under the jurisdiction of this court to mandate genealogical records produced by the misclassified American Indian will have equal standing in law as Blood Quantum for the Native American accordance with Executive Order 11246, as Amended, and I ask the court to ORDER all defendants where applicable to afford me Redress of Grievances not limited by the statutes of limitations where it can be reasonably determined that they failed to do so, and and finally I humbly ask to be made whole in the amount of \$444,000,000 American US dollars tax exempt. 28 USC section 1331. 42 USC section 1983: 28 USC 2201

Federal rule of civil procedure 11, by signing below I certify to the best of my knowledge, information, and believe that this complaint; (1) is not being presented for any improper purpose, such as harass, because unnecessary delay, or needlessly increase cost of litigation; (2) is supported by existing law or by a non frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have opportunity for further investigation or discovery: and (4) the complaint otherwise complies with requirements of rule 11.

A. For parties without an attorney.

I agree to provide the clerk's office with any changes to my address where case related papers may be served. I understand that my failure to keep a current address on file with the clerk's office may result in the dismissal of my case.

2-13-24

Plaintiff Signature: \(\sum_{\text{orn}}\)

Plaintiff Print Name. Darry Lacros

2255 West Burnside SL Portland OR 97210